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PSRNYC

PHYSICIANS FOR SOCIAL RESPONSIBILITY/NYC
Disarmament • Environmental Protection • Violence Reduction

July 12, 1999

6796 '99 JUL 15 A11:58

William Hubbard
Docket Management Branch HFA-305
Food and Drug Administration
5630 Fishers Lane, Room 1601
Rockville, MD 20852

Re: Docket No. 98N-1038,
"Irradiation in the Production, Processing, and Handling of Food"

Dear Mr. Hubbard:

We are concerned about the prospect of weakening the labeling requirements for irradiated food. Too few medical studies have been done to show conclusively whether irradiated food is safe to eat. Even the improved e-beam irradiators introduce free radicals, radiolytic products and carcinogens. Further, food irradiation as a solution ignores the fact that factory farms, feed lots and slaughtering facilities are the cause of contamination in meat supplies.

In any case, foods containing ingredients that have been treated by irradiation should be clearly labeled on the principal display panel and accompanied by the radura, the international symbol of irradiated food. If the food is not packaged, this information should be clearly displayed on a poster in plain view.

Like other labels required by federal law, irradiation labels must be truthful. Proposals to use euphemistic phrases like "cold pasteurization" are misleading because pasteurization is an entirely different process of rapid heating and cooling. The terms "treated with radiation" or "treated by irradiation" should be retained because they accurately portray the irradiation process.

Consumers have a right to know how their food has been processed. Please ensure that labeling requirements are strengthened, not weakened.

Sincerely



Wendy Perron
Executive Director

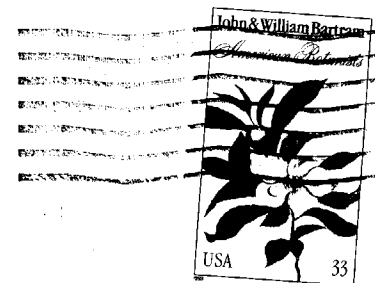
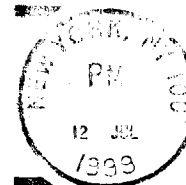
475 Riverside Drive • Room 551 • New York, NY 10115

Phone: 212-870-2980 • Fax: 212-870-2243 • Email: psrnyc@igc.apc.org

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PSRNYC
PHYSICIANS FOR SOCIAL RESPONSIBILITY/NYC
475 Riverside Drive • #551 • New York, NY 10115

Address Correction Requested



William Hubbard
Dockets Mgt Branch AFA-305
FDA
5630 Fishers Lane, Rm. 1601
Rockville, MD 20852

20852/0001

